

UNITED STATES DISTRICT COURT

JAN 05 2014

for the

Western District of Virginia

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

United States of America

v.

Turhan Bey Law II

Case No.

7:15-mj-00023

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2, 2014 in the county of Roanoke in the
Western District of Virginia, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 846

Attempt and conspiracy

21 U.S.C. § 841(a) (1)

Possession with Intent to Distribute a Quantity of Heroin, a Schedule I controlled substance

18 U.S.C. § 924(c)

Possession of a firearm during and in relation to a drug trafficking crime

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.*Sean P. McCafferty*
Complainant's signature

Sean P. McCafferty, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date:

February 5, 2015

City and state:

Roanoke, Virginia*Robert S. Ballou*
Judge's signature

Robert S. Ballou, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA

v.

TUHRAN BEY LAW II

)
)
)
)
)

CRIMINAL NO: 7'15-mj-00023

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

I, Sean P. McCafferty, Postal Inspector, U. S. Postal Inspection Service, being duly sworn, depose, and state the following:

1. I am a United States Postal Inspector employed with the United States Postal Inspection Service since June 2013. My responsibilities include the investigation of crimes involving the United States Postal Service and crimes furthered through the use of the United States Mail. This includes the investigation of controlled substances sent through the U.S. Mail. The facts contained in this affidavit are not all of the facts known to your affiant, but only those sufficient to show probable cause.

2. This affidavit is made in support of an arrest warrant and criminal complaint charging Tuhuran Bey Law II with knowingly and intentionally possessing with the intent to distribute a Schedule I controlled substance, in violation of Title 21 United States Code, Section 841(a) (1), and knowingly conspiring to use the United States Mail to possess with the intent to distribute and to distribute a Schedule I controlled substance, in violation of Title 21, United States Code, sections 843(b) and 846.

12815
2/5/2015

3. The information contained in this affidavit is based on information I have gained from my investigation, my personal observations, my training and experience, and information relayed to me by other law enforcement officers and witnesses.

BACKGROUND OF INVESTIGATION

4. On February 2, 2015, Postal Inspectors and Virginia State Police Special Agents conducted a parcel interdiction at the United States Postal Service (USPS) Carrier Annex in Roanoke, VA. USPS Priority Mail parcel #9505511063305030431453, (hereinafter referred to as the subject parcel), bearing a return address of John Bagley, 796 Astor Ave Apt. #1F, Bronx, NY 10467 and a delivery address of Sean Clark, 1135 Jamison Ave S.E. Roanoke, VA 24013 was intercepted for further investigation.

5. Your affiant received and executed a federal search warrant on the subject parcel. Upon executing the warrant, your affiant found the parcel contained approximately 4.9 ounces of a brown powder wrapped in black duct tape which field tested positive for heroin.

6. Postal Inspectors placed approximately one (1) gram of the brown powder back into the original packaging in order to affect a Controlled Delivery of the parcel.

7. Continuing on February 2, 2015, the subject parcel was delivered to 1135 Jamison Ave SE, Roanoke, VA. Upon receiving no response at the front door, the subject parcel was placed on the porch outside the front door of the residence. Postal Inspectors and members of the Virginia State Police and Roanoke High Intensity Drug Trafficking Area

MS
2/5/2015

7:15-mj-00023

(HIDTA) Task Force maintained surveillance on the subject parcel and the residence at 1135 Jamison Ave SE, Roanoke, VA.

8. Shortly after the subject parcel was delivered, members of the Virginia State Police and Roanoke HIDTA observed an African-American male walk across the street from 1132 Jamison Ave SE, Roanoke, VA to 1135 Jamison Ave SE, Roanoke, VA. The male picked up the subject parcel and walked back across the street and into the residence located at 1132 Jamison Ave SE, Roanoke, VA. Shortly thereafter, the African-American male and a previously observed Caucasian female exited 1132 Jamison Ave SE, Roanoke, VA and began to walk West on Jamison Ave. At that time, members of the Virginia State Police Tactical Team approached and detained both the male and female.

9. Shortly thereafter, your affiant approached the male that was under investigative detention. Your affiant identified himself as a federal agent with the United States Postal Inspection Service and obtained identification from the male. The male was identified as Turhan Bey Law II. At this time, your affiant advised Turhan Bey Law II of his constitutional rights per Miranda. Law verbally acknowledged his understanding of his constitutional rights and indicated he was willing to answer questions.

10. Continuing on February 2, 2015, a state search warrant of the residence at 1132 Jamison Ave SE was obtained and executed. Law was interviewed during the execution of the state search warrant.

11. During the interview of Turhan Bey Law II, Law stated he resides at 1132 Jamison Ave SE, Roanoke, VA. Law further stated he

128B
2/5/2015

had a loaded 9mm handgun underneath his mattress in the master bedroom. Law admitted to receiving heroin from a source in Bronx, NY. Law stated he has received heroin from a source multiple times since 2007. Law further stated since April 2014 he met his source in Roanoke, VA approximately five (5) or six (6) times. Law advised he purchased approximately fifty (50) grams of heroin from his source each time they met. Law admitted to expecting the subject parcel, as well as receiving at least three (3) previous packages from Bronx, NY, each containing a quantity of approximately fifty (50) grams of heroin, through the US Mail. Law further stated he paid approximately \$7,000 for each package he personally received from his source as well as the four packages he received via the US Mail.

12. Based on USPS records, your affiant has confirmed at least three (3) packages matching the characteristics of the subject parcel that were delivered to 1135 Jamison Ave SE, Roanoke, VA. The search of the residence yielded the seizure of multiple firearms, narcotics, and narcotics trafficking paraphernalia. A duffel bag located on the first floor of the residence was found to contain an M-4 semi-automatic rifle and an SKS semi-automatic rifle. Several boxes of .223 and .380 caliber ammunition were also contained within the duffel bag. On the second floor of the residence, the subject parcel delivered to 1135 Jamison Ave SE, Roanoke, VA by your affiant was found opened on top of the bed in the master bedroom. A loaded and charged 9mm handgun was located underneath Law's mattress in the master bedroom. Scales, packaging material, and approximately a

MJS
2/5/2015

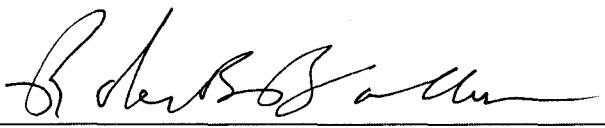
quarter-ounce of cocaine were found in the closet of the master bedroom. USPS Priority Mail parcel #9505511052935003578782 was found in a second bedroom on the second floor. USPS Priority Mail parcel #9505511052935003578782 is one (1) of the four (4) parcels Turhan Bey Law II admitted contained heroin.

CONCLUSION

13. Based on the information contained herein, your affiant maintains there is probable cause to believe that Turhan Bey Law II did knowingly and intentionally possess with the intent to distribute a Schedule I controlled substance, and knowingly conspired with others to use the U.S. Mail to possess with the intent to distribute and to distribute a Schedule I controlled substance, in violation of Title 21, United States Code, sections § 841(a)(1) and § 846. Additionally, your affiant maintains there is probable cause to believe that Turhan Bey Law II did knowingly and intentionally possess a firearm during the commencement of a drug trafficking crime in violation of Title 18, United States Code, sections § 924 (c). Therefore, I respectfully request that an arrest warrant be issued for Turhan Bey Law II.


Sean P. McCafferty
United States Postal Inspector

Sworn to and subscribed before me this 5th day of February, 2015.


The Honorable Robert S. Ballou
United States Magistrate Judge